

As a consumer, I strongly feel that the FCC should continue to press for an opt-in standard for CPNI. Ultimately, my personal information is my own, not my carrier's. If I believe that my carrier has valuable services that I wish to know about, I have the option of requesting notification. If, like most Americans, I have little to no interest in being repeatedly harassed to sign up for unnecessary extra services, I am left alone by default. It is a standard principle of systems design that the default behavior should be the one desired by the majority of users.

It is true that carriers would be less able to create marketing databases under an opt-in scheme. However, the value of a marketing database where the majority of persons do not wish to receive ads is dubious at best. If anything, carriers will be able to save money by only paying to send advertisements to consumers who have opted in. A similar argument applies to sale of CPNI to third parties.

As far as the proposed period of 30 days between notification of right to opt-out and assumption of consent, this is slightly too short. While a consumer may mail a notice of opt-out back to the carrier within the 30 days, it is unlikely that it will be delivered and processed within that timespan (given the sheer volume of information carriers must process each day). 60 days is far more likely to permit the consumer to properly express a choice before consent is assumed. Moreover, a single extra month of delay is unlikely to harm the carrier.